

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**ASHU JOSHI**

**Defendant.**

**4:18-cr-00876-JAR**

**M.D.'S RESPONSE TO DEFENDANT'S  
MOTION TO CONTINUE SENTENCING (DOC. #256)**

Comes now M.D., by and through counsel, and hereby responds to Defendant's Motion to Continue Sentencing (Doc. 256) as follows:

1. A combined plea/sentence is currently set for September 16, 2020.
2. Defendant's motion (Doc. 256) seeks to continue this date for Sentencing purposes.
3. M.D. asks this Court deny Defendant's motion (Doc. 256) to the extent that it would continue Defendant's Change of Plea.
4. M.D. objects to Defendant's motion (Doc. 256) in its entirety; however, in the event this Court is inclined to grant Defendant's motion, M.D. asks this Court to maintain the Change of Plea setting for September 16, 2020.
5. There is nothing in Defendant's motion (Doc. 256) that indicates that the Change of Plea cannot proceed.

WHEREFORE, M.D. asks this Court to proceed with Defendant's Change of Plea on September 16, 2020.

Respectfully submitted,

MUHLENKAMP & BERNSEN,  
ATTORNEYS AT LAW, LLC

By: Tory D. Bernsen

Attorney for M.D.

Tory D. Bernsen, #62857MO

P.O. Box 220126

St. Louis, Missouri 63122

(314) 462-0400

(314) 737-2899 (cell)

tbernsen@mbstlcriminaldefense.com

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the above document was electronically filed on September 8, 2020 and served via the electronic filing system to all attorneys of record.

Tory D. Bernsen